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## State of Washington Citizens Committee on Pipeline Safety

PO Box 47250 Olympia, WA 98504-7250 • [www.utc.wa.gov/pipeline/ccops](http://www.utc.wa.gov/pipeline/ccops)

August 27, 2008

Mary E. Peters  
U.S. Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Dear Secretary Peters:

**RE: Committee Advisory Comments on PHMSA's Draft Propose DIMP Federal Rule of 6/25/2008, ref Docket No. PHMSA-RSPA-2004-19854**

The Washington State Citizens Committee on Pipeline Safety has reviewed PHMSA's Distribution Integrity Management Program ("DIMP") proposed Federal Rule published in the Federal Register on June 25, 2008. A working session powerpoint presentation and discussion minutes of the Committee's action at its July 17, 2008 meeting can be found at [www.utc.wa.gov/pipeline/ccops](http://www.utc.wa.gov/pipeline/ccops).

The Committee supports the DIMP rulemaking effort and advises that the following be incorporated into this important effort in completing the final rule:

- 1) Given its important role in this effort, the term "hazardous leak" should be defined and codified into the federal regulation.
- 2) Additional clarity should be provided as to what constitutes a small versus large gas distribution system operator. The Committee does not believe that number of service connections is a sufficient parameter to make this important distinction.
- 3) Access to certain critical information should be made available and placed in the public domain.

**Hazardous Leak** - Any risk-based approach requires prudent system performance measurements to assure that a risk assessment method is sound and effective. Given the crucial role that hazardous leak repairs play in gauging a distribution system risks, it is critically important that all distribution system operators apply a consistent form of this term. Also because of the possible wide disparity in this definition across the country, this definition must be clear and incorporated into the federal pipeline safety regulation. While review of past history may not assure that a risk-based approach will be effective, lack of consistency in a historical database can render such an approach highly ineffective, preventing sound risk-based decisions.

**Large vs. Small Systems** - The Committee believes it is not the intent of PHMSA to utilize just number of services as a sole deciding factor to determine large gas vs. small gas distribution system operators. A prudent risk-based management process approach should also incorporate other important factors beyond just number of service connections, such as:

- Type of pipe material, and its uniformity within a system,
- Complexity,
- Geographic spread, and
- Other factors that may signal marked increase public risk on such systems.

The additional major factors that PHMSA will consider and incorporate into the large vs. small system characterization should be identified and codified into the final rule as a matter of public record.

**Public Access to Information** - The Committee is especially sensitive to the concept that certain critical information be made a matter of public record to permit gauging of performance in this program. Such information can be made public at a higher level (i.e. via as a state or PHMSA regional office grouping) while remaining sensitive to specific operator commercial details that might be protected under trade secrets, competitive forces, etc. Hazardous leaks repaired, identified by cause and by pipe material (e.g., steel, certain types plastic), are some examples of the information that the public needs to be able to review and verify. Public awareness at this level can instill confidence that progress is being made in gas distribution system integrity.

The Committee wishes to thank you for the opportunity to comment on this important subject.

Sincerely,



Richard B. Kuprewicz, Chairman

cc: Carl Johnson, Administrator, PHMSA  
Stacey Gerard, Assistant Administrator & Chief Safety Officer, PHMSA  
Jeffery Wiese, Associate Administrator of Pipeline Safety, PHMSA  
Mike Israni, Senior Technical Advisor, PHMSA  
Washington State Congressional Delegation  
Electronic filing to Docket No. PHMSA-RSPA-2004-19854